

SHER TREMONTE LLP

July 20, 2021

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED.



Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

July 21, 2021

Dear Judge Hellerstein:

We write on behalf of our client, Jona Rechnitz, the defendant in the above-referenced matter, to respectfully request a temporary modification to Mr. Rechnitz's conditions of release to permit him to travel to Israel in early August for business and to visit relatives. Both Judge Sullivan and Your Honor have previously approved similar modifications to allow international travel, and the government consents to the proposed modification.

If approved, Mr. Rechnitz will travel from August 2 to August 6, 2021, and, as he did previously, will surrender his wife's passport for the duration of the travel. As Your Honor is aware, oral argument on a restitution issue is scheduled to be held telephonically on August 3. Mr. Rechnitz will be able to attend the argument via telephone from Israel. If the Court prefers, however, that Mr. Rechnitz be in the country during the argument, he will adjust the dates of his travel to leave on August 4.

As noted, we have spoken with AUSA Lara Pomerantz and, subject to the aforementioned condition concerning Mr. Rechnitz's wife's passport, the government consents to this request.

Respectfully submitted,

/s/Noam Biale

Michael Tremonte
Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel of record (by ECF)